

Message

From: Hildebrandt, Kurt [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D9CEFDA058B54A41A177BBA9D8C7C233-HILDEBRANDT, KURT]
Sent: 3/16/2020 4:48:37 PM
To: Carrie Ridley [KDHE] [Carrie.Ridley@ks.gov]; r.hoffman_kcc.ks.gov [r.hoffman@kcc.ks.gov]; Rene Stucky [KCC] [r.stucky@kcc.ks.gov]; Sherri Stoner [MDNR] [sherri.stoner@dnr.mo.gov]; Chris.vierrether@dnr.mo.gov; marty.link@nebraska.gov; David Miesbach [NDEE] [david.miesbach@nebraska.gov]; Jones, Amanda C. [amanda.c.jones@nebraska.gov]; Stan Belieu [sbelieu@nogcc.ne.gov]; Todd Boesiger [NOGCC] [tboesiger@nogcc.ne.gov]
CC: Mindrup, Mary [Mindrup.Mary@epa.gov]; Meissner, Benjamin [Meissner.Benjamin@epa.gov]; Campbell, Brent [campbell.brent@epa.gov]
Subject: Continuity of Operations
Attachments: AMWA WI PandemGuideFinal.pdf; Top 10 List for preparing for Natural Disasters and Pandemic Emergencies Public Water Supplies.pdf

Folks --

Carrie posed a question to me about recommendations for operations which may be effected by COVID-19 which got me thinking. Most states and programs have continuity of operations plans which cover the ability of functions to continue in as normal a fashion as possible in the event of a natural disaster or pandemic. I suspect that most larger facilities also have similar plans in place. However, these continuity of operations plans likely do not address things like inspecting wellheads or taking the readings required under the conditions of a permit. In most cases, the permit conditions would require the injection well operations to cease until such time as they can meet the reporting/monitoring requirements contained in the permit but this isn't always possible. So this might be a good time to share with each other what each of the programs either have in place to address these situations or what they are planning on doing in case an operator isn't going to be able to meet the reporting/monitoring requirements that have been put in place by a permit.

I've attached a couple of documents that have been developed for public water supplies which address planning for and dealing with these situations but am unaware of anything like this for the UIC program. However, some of what is in these documents could be reworked for injection well operations.

I wish I had something better to share with you but it wasn't something that we had thought about as part of our overall continuity planning and may be something that we could take up at our four-state meeting later this year. Otherwise, I hope that you find the information I've attached somewhat useful and please share with everyone how you plan to work with operators to allow their operations to continue or if you will tell them to shut the well(s) in if they can't comply with permit conditions as it could highlight something that others hadn't thought about.

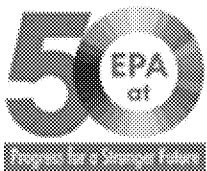
Also note that they are encouraging all of EPA to telework in order to provide some level of social distancing. So we may not be as responsive to your questions as we've been in the past due to the burden on the electronic infrastructure that we have in place. Be patient with us and I promise we will get back with you as soon as possible.

Stay safe and stay healthy.

Regards,
Kurt

Kurt F. Hildebrandt

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From: Carrie Ridley [KDHE] <Carrie.Ridley@ks.gov>

Sent: Monday, March 16, 2020 10:31 AM

To: Hildebrandt, Kurt <Hildebrandt.Kurt@epa.gov>

Cc: Meissner, Benjamin <Meissner.Benjamin@epa.gov>; Campbell, Brent <campbell.brent@epa.gov>

Subject: Reporting questions

As the situation is evolving with COVID-19; does EPA have any recommendations for Operations? What would be considered protective, particularly regarding daily inspections, daily values/reporting, etc. I need to send an update on Arbuckle (our next work group meeting is canceled, was scheduled for Friday) and wanted to give whatever guidance I could at the same time.

Also, Brent can you confirm the UIC training for Dallas has been canceled, I'm guessing it has, but hadn't heard anything-not that you might have heard yet, since everything is pretty crazy right now.

Carrie Ridley, P.G.

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